

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION

In re:)	CHAPTER 7
)	
JAMMIE N. EFFORD)	
)	CASE NO. 18-15487
Debtor)	JUDGE JESSICA E. PRICE SMITH
)	
Creditor Address:)	
)	MOTION FOR AUTHORITY TO REDEEM
NISSAN MOTOR ACCEPTANCE)	PERSONAL PROPERTY AND APPROVAL
)	OF ASSOCIATED FINANCING AND
)	ATTORNEY FEES UNDER 11 U.S.C. 722
)	

Now comes the Debtor, Jammie Nacole Efford, by and through counsel, and moves the court pursuant to 11 U.S.C. 722 and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

1. The item to be redeemed is tangible personal property intended primarily for personal, family or household use is more particularly described as follows:

Year: 2014 Make: Nissan Model: 370Z Miles: 34,223

VIN #: JN1AZ4EH1EM633500

2. The interest of the Debtor (s) in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditor) is a dischargeable consumer debt.
3. The allowed secured claim of said Creditor for purposes of redemption, the "redemption value", should be determined to be not more than \$15,512.00 as evidenced by the attached Vehicle Condition Report ("Exhibit A") and Edmund's Retail Valuation ("Exhibit B").
4. Arrangements have been made by the Debtor (s) to pay to the said Creditor up to the aforesaid amount in a lump sum should this motion be granted.
5. The payment for this proposed redemption is to be financed through Prizm Financial Company, LLC, with all of the particulars of that financing (interest rate, finance charge, amount financed, total of payments, amount of payments, etc.) set forth in full detail in the attachment(s) hereto ("Exhibit C"). As demonstrated there, the monthly amount, term of the payments and the overall amount of the repayment will be decreased significantly through the proposed redemption. Moreover, the Debtor has agreed to borrow and disperse additional funds in the amount of \$600.00, from their loan with Prizm Financial Company, LLC, for representation of the debtor(s) in securing for the benefit of the debtor(s) an order

granting the debtor(s) the right to redeem under 11 U.S.C. 722 a certain motor vehicle, such compensation being in addition to that previously disclosed and being for services rendered beyond the scope of the legal services to have been rendered for such compensation heretofore disclosed.

WHEREFORE, the Debtor, Jammie Nacole Efford, requests the Court to order the Creditor, Nissan Motor Acceptance, to accept from the Debtor (s) the lump sum payment of the redemption value and release their lien of record. In the event the said Creditor objects to this motion, the Debtor (s) requests the Court to determine the value of the property as of the time of the hearing on such objection.

Respectfully submitted,

/s/ Virgil E. Brown
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CERTIFICATE OF SERVICE

A copy of the Motion has been served electronically or by regular mail upon the following this day of JANUARY, 2019.

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Nissan Motor Acceptance at LRCGPRO@NISSAN-USA.com

Nissan Motor Acceptance by fax at 972-607-7361

United States Trustee at registered address@usdoj.gov

Sheldon Stein, Trustee at sstein@epiqtrustee.com

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